

# Federal Defenders OF NEW YORK, INC.

Southern District  
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May 20, 2024

Honorable Valerie Caproni  
United States District Judge  
Southern District of New York  
50 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

USDC SDNY  
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Re: *United States v. Alberto Roman*, 21 Cr. 135 (VEC)

Dear Judge Caproni:

I write on behalf of the parties pursuant to the Court's February 29, 2024 Order (ECF No. 100) to update the Court as to the status of Mr. Roman's state prosecution and to respectfully request that the Court adjourn the control date of June 4, 2024 for a period of around 90 days.

Alberto Roman was arrested by the NYPD on February 17, 2024, and has remained incarcerated at Rikers Island since that date. His next state court appearance is currently scheduled for June 20, 2024, but it is unlikely that Mr. Roman's case will be resolved at that time. Indeed, our expectation is that his state case will again be adjourned for several months, and that Mr. Roman will remain in state custody.

Accordingly, we respectfully request that the Court adjourn the control date of June 4, 2024 for a period of around 90 days. If within that time, there is any substantive change in Mr. Roman's situation, we will alert the Court. Moreover, a federal warrant has been lodged, and thus, in the unlikely event that Mr. Roman is released from custody, he will be transferred into federal custody to face the pending violations of supervised release.

Respectfully submitted,

/s/

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Martin S. Cohen  
Tel. 646-588-8317

cc. Christy Slavik, Esq.

Application GRANTED. The control date is ADJOURNED from Tuesday, June 4, 2024, to **Wednesday, September 4, 2024**. The parties must file a joint status update letter via ECF by no later than **Thursday, August, 29, 2024**. Any request to adjourn the control date must be included in the status update letter. The parties may file the letter with redactions if needed to protect sensitive information.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

5/20/2024

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE